

### REMARKS

This Application has been carefully reviewed in light of the Office Action mailed September 12, 2003. At the time of the Office Action, Claims 1-46 were pending in this Application. Claims 1-18 were rejected. Claims 19-46 were previously cancelled due to an election/restriction requirement. Claims 2, 4-10, 12-15 and 17 have been amended. Claims 7 and 10 have been amended to further define various features of Applicants' invention. Applicants respectfully request reconsideration and favorable action in this case.

#### **Rejections under 35 U.S.C. § 112**

Claims 7 and 10 were rejected by the Examiner under 35 U.S.C. § 112, second paragraph, as being indefinite and failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended Claims 7 and 10 to overcome these rejections and respectfully request full allowance of Claims 7 and 10 as amended.

#### **Rejections under 35 U.S.C. § 103**

Claims 1-6, 8, 9, and 11-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,231,428 issued to Gerard S. Maloney et al. (hereinafter "Maloney"). Applicants respectfully traverse and submit that Maloney fails to teach, suggest or otherwise disclose Applicants' claimed invention.

In order to establish a prima facie case of obviousness, the references cited by the Examiner must disclose all claimed limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). Furthermore, according to § 2143 of the Manual of Patent Examining Procedure, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the

reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Maloney "provides [a] structure and method for achieving a uniformly polished or planarized substrate such as a semiconductor wafer including achieving substantially uniform polishing between the center of the semiconductor and the edge of the wafer". Maloney provides a wafer carrier and subcarrier assembly structure to mount and hold a semiconductor wafer during polishing operations. Vacuum forces through holes or apertures at one surface of the wafer subcarrier are provided "for holding the wafer during a period [of] time between loading the wafer and initiation [of] polishing" as well as "to urge the wafer away from the subcarrier during wafer unload operations". The holes or apertures are also provided for applying "downward polishing pressure on the wafer through the wafer subcarrier and a separate downward pressure on a retaining ring for maintaining the wafer within a pocket and for interacting with the polishing pad".

Claims 47 and 48 have been added to replace Claims 1 and 11 respectively. Applicants respectfully submit that Maloney does not motivate, teach, suggest or otherwise disclose a "system for testing a display device" including, among other elements, "at least four apertures operable to couple the first surface of the display device to the first surface of the base and further operable to optimally counterbalance gravitational forces on the display device in the maintenance of the coupling between the display device and the base during display device testing" as recited in Claim 47. Further, Applicants respectfully submit that Maloney does not motivate, teach, suggest or otherwise disclose a "system for testing a display device" including, among other elements, "a vacuum box including a first surface ... operable to couple the first layer of the display device to the vacuum box and further operable to maintain the display device substantially free from distorting forces in a predetermined position relative a testing apparatus during testing" as recited in Claim 48. Accordingly, Applicants respectfully request that the Examiner consider Claims 47 and 48 and allow the same.

Claims 1 and 11 have been cancelled. Claims 2-10 and 12-18 have been amended to depend from newly added Claims 47 and 48, respectively. Claims 2-10 and 12-18 depend from and provide further patentable limitations to allowable Claims 47 and 48, respectively. Applicants respectfully request that the Examiner reconsider the rejections to Claims 2-10 and 12-18, withdraw the rejections and allow Claims 2-10 and 12-18.

**Newly Added Claims**

In addition to Claims 47 and 48, Applicants have added Claim 49. Applicants respectfully submit that Maloney does not motivate, teach, suggest or otherwise disclose a "system for testing a display device" including, among other elements, a "plurality of apertures operable to couple the display device to the vacuum box during testing such that the display device is maintained in a predetermined position relative a display device testing apparatus substantially free from tensile forces" as recited in newly added Claim 49. Accordingly, Applicants respectfully request that the Examiner consider newly added Claim 49 and allow the same.

**CONCLUSION**

The application has been reviewed in light of the Office Action mailed September 12, 2003. Applicant appreciates the Examiner's careful review of the application. Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all remaining claims.

Applicants enclose a Request for One-Month Extension along with a check in the amount of \$55.00 (small entity) for the filing fee.

Applicants believe there are no additional fees due, however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 02-0383 of Baker Botts L.L.P.

ATTORNEY DOCKET  
075115.0126

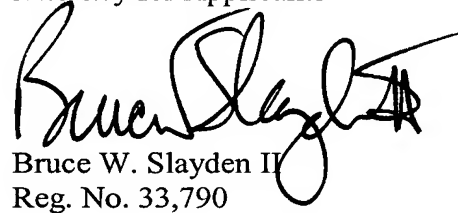
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If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2606.

Respectfully submitted,

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Attorney for Applicants

A handwritten signature in black ink, appearing to read "Bruce W. Slayden II", with a stylized flourish at the end.

Bruce W. Slayden II  
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